

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	RM-8143
Enhanced 911 Emergency Calling Systems)	
_____)	

REPLY COMMENTS OF THE WIRELESS CONSUMERS ALLIANCE, INC.

Wireless Consumers Alliance, Inc. ("WCA") replies to some of the comments filed in response to the Commission's *Further Notice of Proposed Rulemaking (Notice)* in the above captioned matter as follows.

In our comments we pointed out that there is an established method for call back to non service initialized wireless phones which is described in patents filed by Verizon. There are no doubt other methods. We also predicted that the wireless industry would not offer any solutions to meet this public safety need and would simply attack any suggestions offered by others.

The following wireless comments are true to our prediction:

(1) Cingular misstates the substitute local telephone number process taught in the Verizon Patents. These numbers are dialable local numbers, which will route to the wireless carrier switch via the PSTN.¹ Once received by the switch, their use is as described in the

¹ Cingular erroneously states that 000-000-0000 is an example of a TLDN and therefore is not dialable. This description of a TLDN is blatantly wrong. The TLDN must be recognized by the PSTN as belonging to a specific switch in order to route the roamer's call from the home switch to the visited switch! Therefore, TLDNs contain NPA-NNX-XXX, and the PSTN sees them as a dialable number for routing and call delivery

Patents. The need for authentication is not an issue of any magnitude, as it is not required for callers who dial 911 in the first place. The Commission can extend this mandate which eliminated authentication on calls originated to 911 in the first report and order to eliminate such authentication on 911 call back using substitute local telephone numbers as well.

(2) The North American GSM Alliance states that call back to Simless phones is not currently possible. We agree. However call back to a handset with a Sim could be accomplished using a temporary dialable number but the network “may still require advance knowledge of the IMSI by the network.” We also agree and point out that the network acquires this knowledge at the time the 911 call is placed and no other action would be necessary.

(3) AWS comments also misrepresent the TLDN use in call delivery. The mapping of the handset MIN/ESN to the assigned TLDN enables the serving (i.e. visited) switch to signal that mapped MIN/ESN *not* forward the call somewhere else.

(4) CTIA’s Comments point out that callback is routed over the PSTN, which is correct. If this callback is directed to a substitute local telephone number, the mobile switch will be able to recognize this call as special and can suspend the authentication process and deliver the callback call. The hypotheticals proposed as to how many numbers would be required for the WCA proposed solution borders on the ludicrous.

The public interest requires the Commission to mandate call back to provide adequate consumer protection when emergencies occur. The Commission and consumers should not be left to rely on the benevolent concurrence of the CMRS carriers, particularly when issues of public safety are concerned, before adopting rules. Therefore, the Commission should soundly

reject temporizing measures which will not cover the millions of legacy wireless phones that are solely intended to be used to call 9-1-1. If call back is not possible, then the PSAP operator should be so notified and have the capability of holding the connection open until the operator terminates the call.

August 7, 2001

Respectfully submitted,

[signature]

Carl Hilliard
Wireless Consumers Alliance
P.O. Box 2090
Del Mar, California 92014
(858)509-2938
(858) 509-2937
carl@wirelessconsumers.org